

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.:

ARTEM GOLIKOV,

Plaintiff,

v.

AMSPEC, L.L.C.,

Defendant.

COMPLAINT

{Jury Trial Demanded}

Plaintiff, ARTEM GOLIKOV (“Golikov”), brings this action against Defendant, AMSPEC, L.L.C. (“Amspec”), and alleges as follows:

1. This is an action arising under the Fair Labor Standards Act 29 U.S.C. §§ 201-219 (“FLSA”). Jurisdiction is conferred on this Court by 28 U.S.C. § 1331 and 29 U.S.C. § 216(b).
2. At all times material hereto, Golikov was a resident of Florida and an “employee” of Defendant as defined by the FLSA.
3. At all times material hereto, Amspec was a Florida corporation that regularly transacted business in Broward County, Florida.
4. Amspec’s business involves oil and energy testing and inspections.
5. Amspec has employees handling, selling, or otherwise working on goods or materials that have been moved in or produced for commerce including but not limited to computers, phones, pens, and paper.
6. Upon information and belief, Amspec’s gross sales or business done was in excess of \$500,000 per year at all times material hereto.

7. Amspec was an enterprise engaged in commerce or the production of goods for commerce and is covered by the FLSA at all times material hereto.
8. Golikov worked for Amspec as a petroleum inspector.
9. Amspec failed to pay Golikov's full and proper overtime wages.
10. Amspec knowingly and willfully refused to pay Golikov's legally-entitled wages.
11. Attached as **Exhibit A** is a preliminary calculation of Golikov's claims. These amounts may change as Golikov engages in the discovery process.
12. Golikov retained the services of the undersigned and is obligated to pay for the legal services provided.

COUNT I
VIOLATION OF THE FAIR LABOR STANDARDS ACT
AGAINST DEFENDANT AMSPEC

13. Plaintiff realleges and incorporates the allegations set forth in paragraphs 1-12 above as if set forth herein in full.
14. Plaintiff alleges this action pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 216 (b), that Plaintiff is entitled to: (i) time-and-a-half overtime pay, and (ii) liquidated damages pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201 et seq.
15. Plaintiff seeks recovery of damages as referenced above and further seeks interest, costs, and attorneys' fees pursuant to 29 U.S.C. § 216(b).

WHEREFORE, Plaintiff demands judgment against Defendant plus costs, reasonable attorneys' fees, and such other remedy as the court deems just and appropriate.

Respectfully submitted,

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